

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA )

v. )

STEVEN J. GRAVES, )

Defendant. )

No. 1:17-cr- 00205 (LO)

CRIMINAL INFORMATION

Count 1

(Conspiracy to Defraud the United States and Commit Wire Fraud)

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From in or about March 2011, and continuing thereafter until at least in or about March 2016, in the Eastern District of Virginia and elsewhere, the defendant, STEVEN J. GRAVES ("GRAVES"), and others known and unknown to the investigation, including PERSON A, willfully, knowingly, and unlawfully conspired:

a. To defraud the United States of money and property and the right to control the disposition of its assets, that is: (1) the issuance of contracts and purchase orders obligating the United States and the U.S. Department of State ("DoS") to pay for goods and services; (2) payments made pursuant to the contracts and purchase orders; and (3) control over how the United States and the DoS spent the funds allocated for the work covered by the contracts and purchase orders, in violation of 18 U.S.C. § 371;

b. To defraud the United States by impairing, impeding, obstructing, and defeating the DoS's lawful government functions, including the DoS's procurement of supplies

and services, in a manner free from fraud, dishonesty, deceit, conflict of interest, and corruption, in violation of 18 U.S.C. § 371;

c. To commit wire fraud, that is, having devised and intended to devise a scheme and artifice to defraud the United States, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice, transmit and cause to be transmitted by means of wire communications in interstate commerce writings, signs, signals, pictures, and sounds, in violation of 18 U.S.C. § 1343.

**Manner and Means of the Conspiracy**

2. It was a part of the conspiracy that GRAVES and PERSON A would by deceit, craft, trickery and dishonest means, defraud the United States out of money and property, the right to control the disposition of its assets, and interfere with and obstruct the lawful governmental functions of the DoS, in that GRAVES and PERSON A used GRAVES' official position at the DoS to steer contracts and purchase orders to a government contractor in Texas, Honest, Experienced, Reliable, Contracting LLC ("HERC"), while concealing from the DoS and others that GRAVES had a conflict of interest and was partial and biased due to his business, financial, and personal relationship with HERC and PERSON A.

3. It was a further part of the conspiracy that GRAVES sought out contracting opportunities for HERC and PERSON A, introduced PERSON A to DoS employees and current or prospective contractors, provided advice on the preparation of bid proposals, and supplied PERSON A with confidential bid and procurement information.

4. It was further a part of the conspiracy that PERSON A and others used confidential bid and procurement information in an effort to gain a competitive advantage over other prospective contractors.

5. It was further a part of the conspiracy that GRAVES and PERSON A kept secret and concealed from others, including actual or contemplated HERC business partners, the true nature of their relationship and intentionally omitted the true nature of their relationship in communications to or intended for the DoS or its employees.

6. It was a further part of the conspiracy that GRAVES, PERSON A, and others sought to steer DoS contracts to HERC for their personal enrichment.

**Overt Acts**

8. On or about September 24, 2012, GRAVES recommended and caused a contracting official to award DoS Contract No. SAQMMA12C0255 to HERC.

9. On or about September 19, 2012, GRAVES recommended and caused a contracting official to award DoS Purchase Order No. SAQMMA12M2357 to HERC.

(In violation of 18 U.S.C. § 371.)

**Count 2**

**(Conflict of Interest)**

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

10. Between in or about November 2011 and in or about February 2013, in the Eastern District of Virginia and elsewhere, the defendant, STEVEN J. GRAVES, being an officer and employee of the executive branch of the United States Government, knowingly and willfully participated personally and substantially as a Government officer and employee, through decision, approval, disapproval, recommendation, the rendering of advice, and otherwise in an application, contract, claim, and other particular matter, in which GRAVES had a financial interest and in which HERC and PERSON A, as a general partner of HERC, had financial interests.

(In violation of 18 U.S.C. §§ 208(a) and 216(a)(2).)

Forfeiture Allegation

Pursuant to Federal Rule of Criminal Procedure 32.2, the defendant is hereby notified that upon conviction of the offense charged in Count 1 of this Criminal Information, he shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense charged in Count 1. The United States may also seek an order forfeiting substitute assets if the proceeds of the offenses are not available.

(In accordance with 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).)

Dana J. Boente  
United States Attorney

By:

  
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Brian D. Harrison  
Edward P. Sullivan  
Special Assistant U.S. Attorneys (LT)